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May 25, 2021

Honorable Rosemary Gambardella

U.S. Bankruptcy Court
MLK Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

Re: **Saglara Mills, Debtor**
Chapter 7; Case No. 18-24115-RG
Notice of Proposed Compromise or
Settlement of Controversy
Hearing Date - June 08, 2021 @ 10AM

Dear Judge Gambardella:

This office represents Trustee Barbara A. Edwards in the above matter. The petition in this case was filed on March 5, 2021. We are submitting this letter in response to an objection filed on May 24, 2021 by creditor Craig J. Miklencic to a proposed settlement of controversy of debtor's claim for damages arising from a motor vehicle accident on August 19, 2015.

Debtor suffered bodily injuries in the subject accident. Trustee applied to this Court for an Order appointing the firm of Blume, Forte, Fried, Zerres & Molinari, P.C. as special litigation counsel. There was no objection to the retention of that firm from creditor Miklencic or any other party. Accordingly, this Court entered an Order appointing said firm as special litigation counsel. The Order was docketed on January 25, 2021.

Based on Trustee's analysis and the recommendation of special counsel, Trustee has determined that the proposed settlement is fair and reasonable under the circumstances and seeks its approval by this Court. The creditor offers only a blanket objection and offers no factual basis for the objection.

Accordingly, Trustee requests that this Court reject the objection and approve the proposed settlement.

Respectfully Submitted,


JAMES P. D'ALESSANDRO,
For the Firm

JPD:jp

cc: Craig J. Miklencic
Blume, Forte, Fried, Zerres & Molinari, P.C.